

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT

Defendant.

C.A. No. 1:22-cv-10407-PBS

**JOINT MOTION FOR AN EXTENSION OF TIME AND TO AMEND THE
SCHEDULING ORDER**

Defendant United States Immigration and Customs Enforcement (“ICE”), by its attorney, Rachael S. Rollins, U.S. Attorney for the District of Massachusetts, and Plaintiff American Civil Liberties Union of Massachusetts (“ACLUM”) hereby jointly move this court for a 45-day extension of time and amendment of the Scheduling Order, as set forth below. *See* Dkts. 12, 14.

This FOIA case arises from a request for records submitted by the Plaintiff to ICE on January 31, 2022 (the “Request”). *See* Complaint ¶13 & Ex. A (request). The parties have been conferring in an attempt to resolve the matter without the need for further litigation, and discussions remain ongoing. To allow additional time to attempt to resolve the remaining issues before motion practice is necessary, the parties propose the following schedule for the filing of their respective cross-motions for summary judgment:

Matter	Requested Date
Last day for Defendant to file motion for summary judgment and serve Vaughn index	November 17, 2022
Last day for Plaintiff to file combined cross-motion for summary judgment and opposition to Defendant's motion	December 15, 2022
Last day for Defendant to file opposition brief	January 5, 2023
Last day for Plaintiff to file reply brief	January 26, 2023
Summary judgment hearing on a date convenient for the Court	February/March 2023

Wherefore, the parties respectfully request this Court allow their motion for an extension of time and amend the Scheduling Order, as set forth above.

Dated: September 23, 2022

FOR THE PLAINTIFFS,

/s/ Adriana Lafaille¹

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Respectfully submitted,

FOR THE DEFENDANT,

RACHAEL S. ROLLINS
United States Attorney

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¹ Signed with consent given by email on September 23, 2022.